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June 13, 2025

**VIA ECF**

Hon. John G. Koeltl, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**APPLICATION GRANTED  
SO ORDERED**

  
John G. Koeltl, U.S.D.J.

**Re: Namel Norris v. Vicsam Rest. Inc. et al**  
**Case No.: 1:25-cv-00389 (JGK)**

6/14/25

Dear Judge Koeltl:

This Firm represents defendant Vicsam Rest. Inc. ("Vicsam") in the above-captioned matter. Pursuant to Your Honor's Individual Rule of Practice (I)(C), we write to respectfully request that Vicsam's time to answer, move or otherwise respond to the Complaint, which is currently due June 18, 2025, (ECF No. 17) be extended up to and including July 18, 2025 (by 30 days), with any related deadlines similarly extended.

Vicsam and Plaintiff have been engaged in negotiations to explore a potential amicable resolution of this matter, and Vicsam makes this request, with Plaintiff's consent, in the interest of judicial economy to allow the parties to continue, and complete these negotiations. This request will also allow the parties to memorialize any agreement to writing.

This is Vicsam's fourth request for an extension of time to respond to the Complaint and we are hopeful that it is the last. The requested extension will not impact any other scheduled dates.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Shira M. Blank  
Shira M. Blank

cc: Counsel of Record (via ECF)